



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



MAR 04 2014

Mr. Dallas Belcher  
NAS Lemoore  
750 Enterprise Ave., Rm 107  
Lemoore, CA 93246

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # C-2106  
Project # C-1133401**

Dear Mr. Belcher:

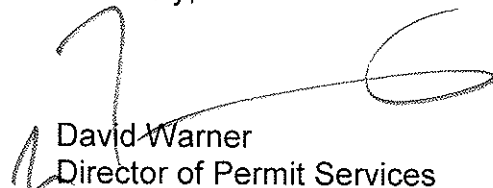
Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The proposed modifications consist of removing unit -131, which has been surrendered, from the combined annual fuel usage limit, and revising the permit conditions which describe the fuel metering device and how the facility records the amount of fuel used in the operation.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
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Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

**San Joaquin Valley Air Pollution Control District**  
**Authority to Construct Application Review**  
(Fire Training Operation)

Facility Name: NAS Lemoore	Date: February 11, 2014
Mailing Address: 750 Enterprise Ave., Rm 107 Lemoore, CA 93246-5001	Engineer: Derek Fukuda Lead Engineer: Joven Refuerzo
Contact Person: Dallas Belcher	
Telephone: (559) 998-2838	
E-Mail: <a href="mailto:Dallas.belcher@navy.mil">Dallas.belcher@navy.mil</a>	
Application #(s): C-2106-170-2	
Project #: C-1133401	
Deemed Complete: December 31, 2013	

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**I. Proposal**

NAS Lemoore has requested an Authority to Construct (ATC) permit for the modification to an existing transportable LPG/propane-fired mobile aircraft fire training device (MAFTD), Permit to Operate (PTO) C-2106-170-1 (see Appendix B). The facility is proposing to remove unit -131, which has been surrendered, from the combined annual fuel usage limit. In addition, the facility is proposing to revise the permit conditions which describe the fuel metering device, and how the facility records the amount of fuel used in the operation.

The fuel metering device on the MAFTD is a percent capacity gauge for the fuel tank providing the MAFTD with LPG/propane. This gauge shows what percentage of the tank is filled with fuel. By using the known fuel capacity of the tank and the percent capacity gauge, the facility is able to accurately measure the amount of fuel used by the MAFTD. The current and proposed permit conditions are shown below:

Current Permit Conditions:

- The MAFTD shall be equipped with a non-resettable fuel flow metering device. [District NSR Rule and 2520]
- Permittee shall maintain daily and annual records of the amount of LPG used in the MAFTD. The amount of LPG used shall be taken from the non-resettable fuel flow meter. [District Rules 2201 and 2520]

Proposed Permit Conditions:

- The MAFTD shall be equipped with a fuel metering device. [District Rule 2201 and 2520]

- Permittee shall maintain daily and annual records of the amount of LPG used in the MAFTD. The amount of LPG used shall be taken from fuel metering device. [District Rules 2201 and 2520]

The proposed changes to removal unit -170 from the combine annual fuel usage limit, and the revision of fuel metering permit conditions have no effect on the quantity of emissions from the unit. Therefore this is not an NSR modification and is not subject to NSR review.

NAS Lemoore received their Title V Permit on August 31, 2004. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. NAS Lemoore must apply to administratively amend their Title V permit.

## **II. Applicable Rules**

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4301	Fuel Burning Equipment (12/17/92)
Rule 4801	Sulfur Compounds (12/17/92)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)	
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines	

## **III. Project Location**

The site is located on the NAS Lemoore air station, in Lemoore, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

#### **IV. Process Description**

The MAFTD is a steel mock jet aircraft that is mounted on a trailer. LPG is ignited around the mock jet aircraft through designed propane ports. According to the applicant, there is no consistent operation schedule for the existing operation.

#### **V. Equipment Listing**

##### Pre-Project Equipment Description:

**C-2106-170-1:** TRANSPORTABLE LPG/PROPANE-FIRED MOBILE AIRCRAFT FIRE TRAINING DEVICE (MAFTD)

##### Proposed Modification:

Reword the permit condition which describes how records of the amount of fuel used in the operation are measured.

**C-2106-170-2:** MODIFICATION OF TRANSPORTABLE LPG/PROPANE-FIRED MOBILE AIRCRAFT FIRE TRAINING DEVICE (MAFTD): REMOVE UNIT -131 FROM FUEL USAGE SLC AND REVISE FUEL METERING CONDITIONS

##### Post Project Equipment Description:

**C-2106-170-1:** TRANSPORTABLE LPG/PROPANE-FIRED MOBILE AIRCRAFT FIRE TRAINING DEVICE (MAFTD)

#### **VI. Emission Control Technology Evaluation**

The MAFTD consists of designed propane ports around a mock jet aircraft and there is no associated burner, nor blower. Because of the nature of operation, there is no proposed control device. Combustion air (ambient) which contains sufficient oxygen is supplied for combustion of the (propane) fuel. However, the propane ports are specifically designed for proper mixture of fuel and combustion air.

#### **VII. General Calculations**

##### **A. Assumptions**

- LPG is the only fuel that will be used in this operations. (Per Applicant)
- 91.5 MMBtu/1,000 gallon-LPG. (AP-42, Table 1.5-1, 7/08)
- EPA F-factor (adjusted to 60 °F) is 8,578 dscf/MMBtu. (40 CFR 60 Appendix B)
- Maximum hourly fuel usage is 25 gallons/hr. (Per Applicant)

- Maximum daily fuel usage is 600 gallons/day. (Existing Permit)
- Maximum annual fuel usage is 27,800 gallons/year. (Existing Permit)
- Maximum burner rating of the MAFTD is 2.3 MMBtu/hr. (Calculated Below)

$$\begin{aligned}\text{Burner Rating} &= (25 \text{ gallons/hr}) \times (91.5 \text{ MMBtu/1,000 gallon-LPG}) \\ &= \mathbf{2.3 \text{ MMBtu/hr}}\end{aligned}$$

## B. Emission Factors

The emissions factors for this operation were taken from the existing permit. The existing permit conditions were based on a source test of a similar operation in Treasure Island, CA. See Project C-1102078 for more details.

Emission Factors		
	lb/1,000 Gallons	Source
NO <sub>x</sub>	21.45	Existing Permit
SO <sub>x</sub>	0.094	Existing Permit
PM <sub>10</sub>	9.9	Existing Permit
CO	36.43	Existing Permit
VOC	28.62	Existing Permit

## C. Calculations

### 1. Potential to Emit (PE)

The potential to emit for the operation is calculated as follows, and summarized in the tables below:

#### Daily Emissions:

##### Sample PE Calculations:

Daily PE = Emission Factor (lb/1,000 gallons) x Daily Fuel Usage (gallons/day)

Daily Potential to Emit (PE)			
	Emission Factor (lb/1,000 gallons)	Daily Fuel Usage (gallons/day)	Daily Emissions (lb/day)
NO <sub>x</sub>	21.45	600	12.9
SO <sub>x</sub>	0.094	600	0.1
PM <sub>10</sub>	9.9	600	5.9
CO	36.43	600	21.9
VOC	28.62	600	17.2

## Annual Emissions:

### Sample PE Calculations:

Annual PE = Emission Factor (lb/1,000 gallons) x Annual Fuel Usage (gallons/year)

Annual emissions from permit units -131 and -170 were limited by a combined fuel usage limit of 28,700 gallons/year. However, unit -131 has been surrendered by the facility and the annual fuel usage limit will now only apply to unit -170.

Annual Potential to Emit (PE)			
	Emission Factor (lb/1,000 gallons)	Daily Fuel Usage (gallons/year)	Daily Emissions (lb/year)
NO <sub>x</sub>	21.45	28,700	596
SO <sub>x</sub>	0.094	28,700	3
PM <sub>10</sub>	9.9	28,700	275
CO	36.43	28,700	1,013
VOC	28.62	28,700	796

The following permit condition will be added to the permit to accurately reflect the fuel usage limit:

- The annual LPG gas consumption from this unit shall not exceed 27,800 gallons per year. [District Rule 2201]

## Rule 2201 New and Modified Stationary Source Review Rule

District Rule 2201 applies to all new stationary sources and all modifications to existing stationary sources which are subject to the District permit requirements and after construction emit or may emit one or more affected pollutant.

Pursuant to District Rule 2201 Section 3.25, *Modification*, a modification is an action including at least one of the following items:

- Any Change in hours of operation, production rate, or method of operation of an existing emission unit that would necessitate a change in permit conditions.
- Any structural change or addition to an existing emissions unit that would necessitate a change in permit conditions.
- An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limit.
- Addition of any emissions unit that is subject to District permitting requirements.
- A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

This project is for the revision of permit conditions. As discussed above, pursuant to District Rule 2201, the proposed change to the fuel usage limit and the fuel metering condition are not considered modifications. Therefore, the modifications proposed in this project are not subject to the provisions of Rule 2201.

The following permit conditions are listed on the current PTO and will remain on the ATC issued in this project:

- The fire training operation shall be fired on LPG gas fuel (propane) only. [District Rule 2201]
- LPG gas consumption shall not exceed 600 gallons per day. [District Rule 2201]
- Emissions shall not exceed any of the following limits: 21.45 lb NO<sub>x</sub>/1000 gal, 0.094 lb-SO<sub>x</sub>/1000 gal, 9.9 lb PM<sub>10</sub>/1000 gal, 36.43 lb CO/1000 gal, or 28.62 lb VOC/1000 gal. [District Rule 2201]

#### **District Rule 2410 Prevention of Significant Deterioration**

The intent of this Rule is to incorporate the federal PSD rule requirements of Title 40 Code of Federal Regulations (40 CFR) Part 52.21 into the District's Rules and Regulations by incorporating the federal requirements by reference. The prevention of significant deterioration (PSD) program is a construction permitting program for new major stationary sources and major modifications to existing major stationary sources located in areas classified as attainment or in areas that are unclassifiable for any criteria air pollutant.

Section 4.0 states that an owner or operator must obtain a PSD permit pursuant to this Rule before beginning actual construction of a new major stationary source, a major modification, or a plantwide applicability limitation (PAL) major modification, as defined in 40 CFR 52.21(b).

As discussed above, this facility is an existing stationary source. Pursuant to Section 52.21(2)(i), a major modification at an existing stationary source means any physical change in or change in the method of operation of a major stationary source that would result in: a significant emissions increase (as defined in paragraph (b)(40) of this section) of a regulated NSR pollutant (as defined in paragraph (b)(50) of this section); and a significant net emissions increase of that pollutant from the major stationary source.

Within this project, the facility is proposing to revise existing permit conditions. The proposed changes at this facility do not require the facility to make any physical changes to their equipment or changes in their method(s) of operation that result in any emission changes or significant emission increases. Therefore, the proposed project cannot result in a major modification under PSD and the requirements of this rule are not applicable.

## **Rule 2520 Federally Mandated Operating Permits**

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment/minor modification application. The following permit conditions will be added to the permit:

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201]
- {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4]



### **Rule 4001 New Source Performance Standards (NSPS)**

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to fire training operations.

### **Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to fire training operations.

### **Rule 4101 Visible Emissions**

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). As the fire training school solely uses LPG, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. Also, based on past inspections of the facility continued compliance is expected. The following condition will be added to the permit to assure compliance with this rule.

- No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

### **Rule 4102 Nuisance**

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected. The following condition will be added to the permit to ensure compliance with this rule.

- {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

### California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

### Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

$$9.9 \frac{\text{lb-PM}_{10}}{1000 \text{ gal}} \times \frac{1000 \text{ gal}}{91.5 \text{ MMBtu}} \times \frac{7,000 \text{ grain}}{\text{lb}} \times \frac{\text{MMBtu}}{8,578 \text{ dscf}} = 0.09 \frac{\text{grain}}{\text{dscf}}$$

Since 0.09 grain/dscf is less than 0.1 grain/dscf, compliance with this rule is expected. The following condition will be added to the permit to assure compliance with this rule.

- {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

### District Rule 4301 Fuel Burning Equipment

This rule specifies maximum emission rates in lb/hr for SO<sub>2</sub>, NO<sub>2</sub>, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from natural gas combustion are less than 1 μm in diameter.

District Rule 4301 Limits			
Pollutant	NO <sub>2</sub>	Total PM	SO <sub>2</sub>
ATC #C-2106-170-2 (lb/hr)	0.02	0.2	0.004
Rule Limit (lb/hr)	140	10	200

The above table indicates compliance with the maximum lb/hr emissions in this rule; therefore, continued compliance is expected.

### District Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO<sub>2</sub>, on a dry basis averaged over 15 consecutive minutes.

Using the ideal gas equation and the emission factors presented in Section VII, the sulfur compound emissions are calculated as follows:

$$\text{Volume SO}_2 = \frac{n RT}{P}$$

With:

N = moles SO<sub>2</sub>

T (Standard Temperature) = 60°F = 520°R

P (Standard Pressure) = 14.7 psi

R (Universal Gas Constant) =  $\frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}}$

$$0.094 \frac{\text{lb} - \text{S}}{1,000 \text{ gal}} \times \frac{1 \text{ gal}}{0.0915 \text{ MMBtu}} \times \frac{1 \text{ MMBtu}}{8,578 \text{ scf}} \times \frac{\text{lb} - \text{mol}}{64 \text{ lb} - \text{S}} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} - \text{mol} \cdot ^\circ\text{R}} \times \frac{520^\circ\text{R}}{14.7 \text{ psi}} \times 1,000,000 = 0.71 \text{ ppmv}$$

Since 0.71 ppmv is  $\leq 2,000$  ppmv, this engine is expected to comply with Rule 4801.

### California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

### California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

## **IX. Recommendation**

Compliance with all applicable rules and regulations is expected. Pending a successful COC Noticing period, issue ATC C-2106-170-2 subject to the permit conditions on the attached draft ATC in Appendix A.

## **X. Billing Information**

<b>Annual Permit Fees</b>			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-2106-170-2	3020-02-E	2.3 MMBtu/hr	\$412.00

## **Appendixes**

- A: Draft ATC  
B: Current PTO

## **APPENDIX A**

**Draft ATC**

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

PERMIT NO: C-2106-170-2

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: NAS LEMOORE  
MAILING ADDRESS: BUILDING 750 CODE 50800  
LEMOORE, CA 93246-5001

LOCATION: NAVAL AIR STATION LEMOORE  
LEMOORE, CA 93246-5001

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF TRANSPORTABLE LPG/PROPANE-FUELED MOBILE AIRCRAFT FIRE TRAINING DEVICE (MAFTD): REMOVE UNIT -131 FROM FUEL USAGE SLC AND REVISE FUEL METERING CONDITIONS

## CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. The fire training operation shall be fired on LPG gas fuel (propane) only. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The annual LPG gas consumption from this unit shall not exceed 27,800 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services

C-2106-170-2 : Feb 14 2014 8:43AM -- FUKUDAD : Joint Inspection NOT Required

8. LPG gas consumption shall not exceed 600 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions shall not exceed any of the following limits: 21.45 lb NO<sub>x</sub>/1000 gal, 0.094 lb-SO<sub>x</sub>/1000 gal, 9.9 lb PM<sub>10</sub>/1000 gal, 36.43 lb CO/1000 gal, or 28.62 lb VOC/1000 gal. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The MAFTD shall be equipped with a fuel metering device. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
11. Permittee shall maintain daily and annual records of the amount of LPG used in the MAFTD. The amount of LPG used shall be taken from fuel metering device. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2520] Federally Enforceable Through Title V Permit

DRAFT

## **APPENDIX B**

### **Current PTO**



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-2106-170-1

**EXPIRATION DATE:** 04/30/2016

**EQUIPMENT DESCRIPTION:**

TRANSPORTABLE LPG/PROPANE-FUELED MOBILE AIRCRAFT FIRE TRAINING DEVICE (MAFTD)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The fire training operation shall be fired on LPG gas fuel (propane) only. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The combined LPG gas consumption from units C-2106-131 and -170 shall not exceed 27,800 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
4. LPG gas consumption shall not exceed 600 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions shall not exceed any of the following limits: 21.45 lb NOx/1000 gal, 0.094 lb-SOx/1000 gal, 9.9 lb PM10/1000 gal, 36.43 lb CO/1000 gal, or 28.62 lb VOC/1000 gal. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The MAFTD shall be equipped with a non-resettable fuel flow metering device. [District NSR Rule and 2520] Federally Enforceable Through Title V Permit
7. Permittee shall maintain daily and annual records of the amount of LPG used in the MAFTD. The amount of LPG used shall be taken from the non-resettable fuel flow meter. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.